

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

FREDDIE LEE BROWN, JR.,

Plaintiff,

v.

CASCADE MANAGEMENT, INC.,

Defendant.

CASE NO. 3:15-CV-1585-HZ

VERDICT FORM

We, the jury, being first duly empaneled and sworn in the above-entitled cause, do unanimously find as follows:

1. Has Plaintiff proved by a preponderance of the evidence that Plaintiff's race was the sole reason for the Defendant's decision to discharge Plaintiff?

Yes No

If Yes, answer Question No. 5. If No, answer Question No. 2.

2. Has Plaintiff proved by a preponderance of the evidence that Plaintiff's race was a motivating factor in Defendant's decision to discharge Plaintiff?

Yes No

If Yes, answer Question No. 3. If No, answer Question No. 5.

3. Has Defendant proved by a preponderance of the evidence that Defendant's decision to discharge Plaintiff was also motivated by a lawful reason?

Yes No

If Yes, answer Question No. 4. If No, answer Question No. 5.

4. Has Defendant proved by a preponderance of the evidence that it would have made the same decision to discharge Plaintiff even if Plaintiff's race played no role in Defendant's decision to discharge him?

Yes No

Answer Question No. 5.

5. Has Plaintiff proved by a preponderance of the evidence that Plaintiff was subject to a racially hostile work environment by Defendant?

Yes No

Answer Question No. 6.

6. Has Plaintiff proved by a preponderance of the evidence that he was terminated in retaliation by Defendant?

Yes No

Answer Questions 7 and 8 if you answered Yes to **any** of the following questions: 1, 5, and 6. Also, answer Questions 7 and 8 if you answered Yes to Question 2 and No to Question 3. Also, answer Questions 7 and 8 if you answered Yes to Questions 2 and 3 and No to Question 4.

Sign and date the verdict form if you answered No to **all** of the following Questions: 1, 2, 5, and 6. Also, sign and date the verdict form if you answered No to Questions 1, 5, and 6, and yes to Question 4.

7. What are Plaintiff's damages?

Non-economic damages \$ 200,000.00

8. Do you award punitive damages against Defendant?

Yes No

If you answered yes to Question No. 8, answer Question No. 9. If you answered no to Question No. 8, sign and date this Verdict Form.

9. What amount of punitive damages do you award against Defendant?

Punitive Damages \$ 125,000.00

The Presiding Juror should sign and date this Verdict Form.

DATED this 25th day of October, 2017.

Presiding Juror